National Elevator Industry, Inc.

ASSOCIATION HEADQUARTERS

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October 16, 2006

VIA ELECTRONIC MAIL

State of California
State and Consumer
Services Agency
California Building
Standards Commission
Attention: Jane Taylor,
Associate Architect
2525 Natomas Park Dr.,
Suite 130
Sacramento, CA 95833

Re: Introduction of Destination-Oriented Elevators Into New California Building Code

Dear Ms. Taylor:

The National Elevator Industry, Inc. ("NEII"), on behalf of its members[1], writes to offer its support for the suggested revisions to the current Text of the Regulations submitted by Schindler Elevator Corporation ("Schindler") last Friday, October 13, 2006. NEII and its members believe the suggested changes are necessary to address and include Destination Oriented Elevators within the revised California Building Code currently being considered by the Building Standards Commission; the current Code and currently proposed revisions do not specifically authorize this Technology. The majority of NEII's manufacturer members manufacture and promote a Destination Oriented Elevator system. Unless the California Building Code is amended to include provisions accommodating this Technology, elevator manufacturers will face substantial regulatory hurdles when they attempt to install this newer, more efficient Technology – which offers superior benefits to passengers with disabilities – in California.

The current California Building Code, and the proposed amendment thereto, does not include provisions accommodating Destination Oriented Technology, despite the inclusion

[1] Full members include Abell Elevator International, Bucher Hydraulics, Inc., Fujitec America Inc., KONE Inc., Minnesota Elevator Inc., Mitsubishi Electric & Electronics USA, Otis Elevators [Elevator?]Company, Schindler Elevator Corporation, Schumacher Elevator Company and ThyssenKrupp Elevator Corporation.

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of such provisions in the 2003 ADAAG and the 2006 International Building Code, and the use of such technology in more than 21 major U.S. cities and 35 countries worldwide.

In its submission, NEII echos the changes proposed by Schindler. All of the proposed revisions are to accommodate destination oriented elevators which cannot comply with existing Code due to the fundamental difference in the operation of the system as a destination rather than direction oriented technology.

A. Benefits Of Destination Oriented Technology

There are many significant benefits provided by this Technology. With regard to the disabled community, destination oriented technology provides numerous advantageous features and benefits that are absent from traditional elevators, including:

- A standard telephone keypad arrangement with a universally accepted dot on the "5" key of the keypad to orient visually impaired users to the other numbered keys;
- An accessibility button located immediately below the keypad arrangement containing the international symbol for accessibility and three raised dots in the form of an equilateral triangle as specified under the ANSI 407.2.1.7 standard;
- Upon pressing the accessibility key and the floor designation, the keypad immediately begins an audible communication;
- The keypad communicates both visually and audibly indicating to which elevator a passenger should proceed;
- The selected elevator provides visual and audible identification, announcing its arrival;
- The time allowed until the elevator arrives is in excess of typical industry standards, and allows sufficient time for travel by wheelchair;
- The door dwell time is increased for passengers with disabilities (doors stay open longer); and
- Reduction of crowding in the lobby and elevator cars, resulting in clearer path of travel for individuals with disabilities.

In addition to the specific benefits afforded the disabled community, the public derives very substantial benefits from the destination oriented technology, as it promotes significant energy savings based upon the more efficient usage of elevator cars. The energy

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conservation features of the destination oriented technology are consistent with California's "Flex Your Power" energy conservation campaign and the Governor's Green Building Action Plan to reduce energy consumption on a long-term basis.

In Executive Order S-20-04, and the accompanying State of California Green Building Action Plan, Governor Schwarzenegger has encouraged commercial buildings to utilize energy-saving technology:

"10. Commercial building owners are also encouraged to take ***aggressive action*** to reduce electricity usage by retrofitting, building and operating the most energy and resource efficient buildings by taking measures described in the Green Building Action Plan."

Destination Oriented Elevators are more efficient and therefore conserve energy, a recognized goal of the State.

B. Current Accessibility Code Treatment of Destination Oriented Technology

The current version of the International Building Code ("IBC") adopts ICC/ANSI A117.1 (2003) which includes, at Section 407, "exceptions" for destination oriented technology. The IBC acknowledges that destination oriented technology operates fundamentally differently from a direction oriented system such that destination oriented elevators cannot strictly comply with existing accessibility codes.

The current ADAAG was developed in 1991 and remains substantially unchanged. The 1991 ADAAG (current Federal Code) does not include destination oriented elevator technology, as it was not mature technology when the 1991 Code was developed. A revised version of the ADAAG was developed in 2004 ("2004 ADAAG") by the Architectural, Transportation, Barriers Compliance Board (ATBCB), now called the Access Board. The 2004 ADAAG includes destination oriented elevator technology as approved technology in Section 407. Section 407 was based upon 2003 ANSI A117.1, Section 407. The 2004 ADAAG is awaiting the implementing regulations from the US Department of Justice.

C. Proposed Amendments to Existing Title 24 Provisions

In order to accommodate destination oriented elevators in the language of the revised California Building Code, NEII proposes the same modifications to the existing language of Title 24, Part 2, Chapter 11B previously submitted by Schindler, as outlined on the attached forms.

Specifically, NEII supports the proposed amendments to the language of provisions 1116B.1 (Elevators.); 1116B.1.6 (Hall Call.) 1116B.1.8 (Car Inside); 1116B.1.9 (Car Controls.);

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1116B.1.10 (Hall Call Buttons); 1116B.1.13 (Hall Lantern); and 1116B.1.14 (Doorjamb Marking) to accommodate destination oriented elevators which cannot comply with existing Code due to the fundamental difference in the operation of the system as a destination rather than a direction oriented system.

D. Conclusion

Destination oriented elevators are provided for in the IBC, the 2003 ICC/ANSI A117.1 and the 2004 ADAAG. NEII, on behalf of its members, strongly urges the Building Standards Commission to adopt the revisions proposed by Schindler in the attached forms in order to accommodate destination oriented elevators in California's next Building Code revision.

Very truly yours,

William E. Mitchell, Jr.
Member
NEII California Area Code Committee